

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RONALD A. KATZ TECHNOLOGY)
LICENSING, L.P.,)
)
Plaintiff,)
)
v.) C.A. No. 06-547 (GMS)
)
AMERICAN INTERNATIONAL GROUP, INC.)
<i>et al.</i> ,)
)
Defendants.)
)

**ANSWER OF PLAINTIFF RONALD A. KATZ TECHNOLOGY
LICENSING, L.P. TO DHL HOLDINGS (USA), INC.,
DHL EXPRESS (USA), INC. AND SKY COURIER, INC.'S COUNTERCLAIMS**

Plaintiff Ronald A. Katz Technology Licensing, L.P. ("Katz Technology Licensing") answers to the counterclaims of Defendants DHL Holdings (USA), Inc., DHL Express (USA), Inc., and Sky Courier, Inc. (collectively "DHL Defendants") as follows:

THE PARTIES

1. Katz Technology Licensing admits on information and belief that DHL Holdings (USA) Inc. has its principal place of business at 1200 South Pine Island Road, Plantation, Florida 33324. Katz Technology Licensing lacks information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 126 and on that basis denies those allegations.

2. Katz Technology Licensing admits on information and belief that DHL Express (USA), Inc. is an Ohio corporation with its principal place of business at 1200 South Pine Island Road, Plantation, Florida, 33324 as alleged in Paragraph 127.

3. Katz Technology Licensing admits on information and belief that Sky Courier, Inc. has its principal place of business at 21240 Ridgetop Circle, Sterling, Virginia

20166. Katz Technology Licensing lacks information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 128 and on that basis denies those allegations.

4. Katz Technology Licensing admits that the DHL Defendants refer to themselves in their Answer and Counterclaims as both "DHL defendants" and "DHL." Katz Technology Licensing lacks information sufficient to form a belief as to whether DHL Defendants are referred to "collectively and individually" as DHL as alleged in Paragraph 129 and on that basis denies those allegations.

5. Katz Technology Licensing admits that it is California limited partnership with its principal place of business at 9220 Sunset Boulevard, Suite 315, Los Angeles, California 90069 as alleged in Paragraph 130.

JURISDICTION AND VENUE

6. Katz Technology Licensing admits that (a) this Court has subject matter jurisdiction over this action under 28 U.S.C. sections 1331 and 1338(a); and (b) the DHL Defendants purport to bring their counterclaim for a declaratory judgment 28 U.S.C. sections 2201 and 2202. Katz Technology Licensing denies the remaining allegations of Paragraph 131.

7. Katz Technology Licensing admits that venue is proper in this judicial district as alleged in Paragraph 132.

COUNTERCLAIMS

8. Katz Technology Licensing admits there is an actual controversy with respect to DHL's infringement of the patents listed in ¶¶ 54, 55, 57-59, 61-65, 67-69, 71 and 73 of its Complaint. Katz Technology Licensing denies the remaining allegations of Paragraph 133.

9. Katz Technology Licensing denies the allegations of Paragraph 134.
10. Katz Technology Licensing denies the allegations of Paragraph 135.
11. Katz Technology Licensing denies the allegations of Paragraph 136.

PRAYER FOR RELIEF ON DHL DEFENDANT'S COUNTERCLAIMS

Katz Technology Licensing respectfully requests that in response to the counterclaim of the DHL Defendants this Court:

1. Dismiss the DHL Defendants' counterclaims with prejudice;
2. Adjudge that the DHL Defendants are not entitled to any relief, including any of the relief requested in the DHL Defendant's prayer for relief; and
3. Award to Katz Technology Licensing such other relief as the Court may deem appropriate and just under the circumstances.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

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DATED: October 13, 2006

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2006, I electronically filed the foregoing **Answer of Plaintiff Ronald A. Katz Licensing Partners, L.P., to Defendants DHL Holdings (USA), Inc., DHL Express (USA), Inc., and Sky Courier, Inc. Counterclaims** with the Clerk of Court using CM/ECF, which will send notification of such filing to the following:

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I further certify that I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel, and that a copy was served on the following non-registered participants by e-mail and U.S. Mail.

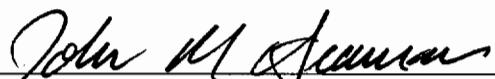
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